

## OPS Request for Comments

### “Gas Pipeline Integrity Management in High Consequence Areas”

Docket No. RSPA-00-7666

#### Summary:

On **June 27, 2001**, the Department of Transportation, Research and Special Projects Administration (RSPA) published a request for comments concerning gas pipeline integrity management program requirements (Federal Register Vol. 66, No. 124). RSPA has previously published the final pipeline integrity management rule for large liquid pipeline operators, and has already proposed the rule for small liquid pipeline operators. However, discussions concerning the appropriate pipeline integrity management requirements for gas transmission pipelines are still in progress. The June 27 document gives a very good description of the unique challenges and special considerations that must be incorporated into a final rule for gas transmission pipeline integrity management programs, such as:

- Gas is not easily stored, and some communities are served by only one gas transmission pipeline. Thus, downtime due to integrity management tests could have serious supply (and possibly price) repercussions.
- Many gas pipelines are not currently capable of accommodating smart pigs, so other forms of assessment may be more appropriate.
- Failures of gas pipelines can result in serious fires, with resulting personnel and property damage, but do not tend to have severe environmental consequences. Thus, the definitions of High Consequence Areas should be different than for liquid pipelines.

RSPA believes that any eventual rule covering integrity management programs for gas operators would have to address the following seven elements:

1. Define the areas where the potential consequences of a gas pipeline accident may be significant or may do considerable harm to people and property.
2. Identify and evaluate the threats to pipeline integrity in potentially high consequence areas (HCA's).
3. Select the assessment technologies best suited to effectively determine each pipeline segment's susceptibility of failure that could affect HCA's.
4. Determine time frames for conducting baseline assessments and making needed repairs using a tiered approach that applies risk prioritization techniques.
5. Identify and implement additional preventative and mitigative measures appropriate to manage significant threats.
6. Continually evaluate and reassess each pipeline segment that could affect HCA's using a risk-based approach that also takes into account information about the entire pipeline.

7. Monitor the effectiveness of the management process in areas where the consequences of potential pipeline accidents are greatest.

Important issues to be decided:

In developing a final rule for gas pipeline integrity management, RSPA will have to make decisions about some important issues, including:

- Definition of what constitutes an HCA for gas pipelines. Because environmental consequences of gas pipeline accidents are different than for liquid pipelines, OPS has focused its identification of HCA's to populated areas, especially areas of high population and areas where residents may have difficulty evacuating in the event of an incident.
- Identify various threats to pipeline integrity. Threats may include such things as corrosion, third party damage, erosion, operator error and other special conditions. OPS would like to receive comments on what best defines a threat as significant.
- OPS will also need to consider what technologies are appropriate for assessing various threats to pipeline integrity. Are statistical assessments of pipeline risks an appropriate management tool, or does assessment require physical inspection and evaluation?
- What time frames are appropriate for conducting baseline assessments and how should potential repairs be evaluated and prioritized?
- How should effectiveness of pipeline integrity management be evaluated? OPS has historically relied on analysis of collected incident data as a means of evaluating program performance. Are there other methods that should be used to track progress?

Comments to OPS:

**Interested persons are invited to submit comments by August 13, 2000.**

Comments may be submitted by one of the following methods:

1. By mail to the Docket Management Facility, US Department of Transportation, 400 Seventh Street SW., Nassif Building, Room PL-401, Washington, DC 20590-0001;
2. By fax to the Docket Management Facility at 202-493-2251; or
3. Electronically through the Docket Management website at <http://dms.dot.gov/> and by clicking the "ES Submit" button located at the top and bottom of the screen.

4. To facilitate the discussion process, an electronic public discussion forum on gas pipeline integrity management issues has been developed on the office of Pipeline Safety's Internet home page at <http://ops.dot.gov/forum>.

The full notice is available on RSPA's website at

[http://assn.cycla.com/opsforum/docs/GasIMP\\_FR\\_Notice\\_mi\\_06\\_14\\_01.pdf](http://assn.cycla.com/opsforum/docs/GasIMP_FR_Notice_mi_06_14_01.pdf)